



LEWIS BRISBOIS BISGAARD & SMITH LLP

Brian Deeney  
One Riverfront Plaza, Suite 800  
Newark, New Jersey 07102  
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Direct: 973.792.8726

May 17, 2021

**VIA E-FILING**

Rosemary Chiavetta, Secretary  
Secretary's Bureau  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

Re: Florence Parker Chaila v. Metropolitan Edison Company et al.  
Docket No.: C-2021-3024417

Dear Ms. Chiavetta:

Enclosed for filing, please find the Amended Motion for Admission Pro Hac Vice of John Coyle, Esq. in the above referenced matter.

Thank you for your kind attention to this matter.

Very truly yours,

*Brian C. Deeney*

Brian Deeney for  
LEWIS BRISBOIS BISGAARD & SMITH LLP

BD:pl

Enclosures

cc: Hon. John Coogan (ALJ)  
Margaret Morris, Esq.  
Florence R. Parker Chaila, JD

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FLORENCE R. PARKER CHAILLA,  
CLAIMANT,  
V.

Docket No. C-2021-3024417

METROPOLITAN EDISON COMPANY AND CHOICE  
ENERGY, LLC d/b/a 4 CHOICE ENERGY

RESPONDENTS.

**CHOICE ENERGY, LLC d/b/a 4 CHOICE ENERGY'S AMENDED MOTION FOR  
ADMISSION PRO HAC VICE**

Pursuant to Rule 5.103 of the rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and 52 Pa. Code §1.22, attorney of record from Choice Energy, LLC d/b/a 4 Choice Energy (“Choice Energy”), Brian C. Deeney, respectfully requests an Order granting admission *pro hac vice* to John Coyle, Esq. as counsel for Choice Energy for all purposes in relation to this proceeding. In support of this Amended Motion, Choice Energy avers as follows:

1. Brian C. Deeney is an active member of the Bar of the Pennsylvania Supreme Court (ID: 312184). Pursuant to 52 Pa. Code § 1.24(b)(1), and has entered his appearance as counsel of record for Choice Energy in this matter.

2. John Coyle, Esq. is a Partner at the law firm of Coyle Law Group LLP, which is located at 55 Madison Avenue, Suite 400, Morristown, NJ 07960, and serves as national counsel for Choice Energy. He is admitted to practice law in New Jersey (Attorney ID: 029632001) and is currently in good standing. Mr. Coyle has never been suspended or disbarred by any jurisdiction.

3. Mr. Coyle agrees to be bound by and comply with the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, the Pennsylvania Rules of

Professional Conduct, and the Rules of this Commission. Mr. Coyle agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omission occurring during his appearance in this matter.

4. Mr. Coyle has consented to the appointment of Brian C. Deeney as his sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record on behalf of Choice Energy.

5. The information required by Section 81.504 of the IOLTA regulations has been provided to the IOLTA Board and the fee required by Section 81.505(a) of the IOLTA regulations has been paid. Attached please find a copy of a fee payment certification from the IOLTA Board.

WHEREFORE, Choice Energy respectfully moves for the admission of John Coyle to appear in this matter *pro hac vice* for Choice Energy for all permissible purposes in relation to this proceeding.

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

*/s/ Brian C. Deeney*

Brian C. Deeney, Esq.

Attorney ID: 312184

One Riverfront Plaza,

1037 Raymond Blvd, Ste. 800

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973.792.8726 (Phone)

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[Brian.Deeney@lewisbrisbois.com](mailto:Brian.Deeney@lewisbrisbois.com)

Date: 5/17/21

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FLORENCE R. PARKER CHAILLA,  
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Docket No. C-2021-3024417

METROPOLITAN EDISON COMPANY AND CHOICE  
ENERGY, LLC d/b/a 4 CHOICE ENERGY

RESPONDENTS.

**SPONSOR'S VERIFIED STATEMENT IN SUPPORT OF AMENDED MOTION FOR  
ADMISSION PRO HAC VICE**

I, Brian C. Deeney, state the following:

1. I am a member of good standing with the Bar of the Supreme Court of Pennsylvania (Attorney ID: 312184) and am acting as sponsor for the *pro hac vice* admission of John Coyle, Esq. to appear before the Pennsylvania Public Utility Commission in this matter.
2. I have known Mr. Coyle for several years, and I believe him to be a reputable and competent attorney.
3. I am sponsoring Mr. Coyle's admission *pro hac vice* in this matter.
4. Any proceeds from the settlement of a cause of action in which Mr. Coyle is granted admission *pro hac vice* shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.
5. I shall remain the attorney of record for this case, as requested by the Pennsylvania Rules of Civil Procedure.
6. I am sponsoring Mr. Coyle for admission *pro hac vice* in two other matters in a court of Pennsylvania: *Application of All Choice Energy MidAmerica LLC for approval to supply*

*electricity or electric generation services as a supplier of electricity to the public in the service territories of PECO Energy Company and PPL Electrical Utilities Corporation (Docket No.: A-2021-3024563) and Application of All Choice Energy MidAmerica LLC for approval to supply natural gas services as a supplier or aggregator engaged in the business of supplying natural gas services in the service territories of PECO Energy Company and Philadelphia Gas Works and UGI Utilities (Docket No.: A-2021-3024607), before this Commission. I am not acting as a sponsor of a candidate in any other courts of record in Pennsylvania.*

7. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

*/s/ Brian C. Deeney*

Brian C. Deeney, Esq.

Attorney ID: 312184

One Riverfront Plaza,

1037 Raymond Blvd, Ste. 800

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[Brian.Deeney@lewisbrisbois.com](mailto:Brian.Deeney@lewisbrisbois.com)

Date: 5/17/21

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FLORENCE R. PARKER CHAILLA,  
CLAIMANT,  
V.

Docket No. C-2021-3024417

METROPOLITAN EDISON COMPANY AND CHOICE  
ENERGY, LLC d/b/a 4 CHOICE ENERGY

RESPONDENTS.

**VERIFIED STATEMENT OF JOHN COYLE IN SUPPORT OF AMENDED MOTION  
FOR ADMISSION PRO HAC VICE**

I, John Coyle, state the following:

1. I am admitted to practice in and am a member in good standing of the bar of New Jersey (Attorney ID: 029632001). I have never been suspended, disbarred, or otherwise disciplined, nor am I currently the subject of an disciplinary proceeding.

2. I have been granted admission *pro hac vice* in two other matters in a court of Pennsylvania: *Application of All Choice Energy MidAmerica LLC for approval to supply electricity or electric generation services as a supplier of electricity to the public in the service territories of PECO Energy Company and PPL Electrical Utilities Corporation* (Docket No.: A-2021-3024563) and *Application of All Choice Energy MidAmerica LLC for approval to supply natural gas services as a supplier or aggregator engaged in the business of supplying natural gas services in the service territories of PECO Energy Company and Philadelphia Gas Works and UGI Utilities* (Docket No.: A-2021-3024607), before this Commission. I have not applied for *pro hac vice* admission in any other actions in Pennsylvania. As such, I have never been denied admission *pro hac vice* in any courts of record in Pennsylvania.

3. I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Profession Conduct.

4. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matter for which admission *pro hac vice* is being sought.

5. I consent to the appointment of the sponsoring attorney, Brian C. Deeney, as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.

6. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsifications to authorities).

**Coyle Law Group LLP**

*/s/ John Coyle*

John Coyle  
55 Madison Avenue,  
Suite 400  
Morristown, NJ 07960  
(973) 370-0592  
[jcoyle@coylelawgroup.com](mailto:jcoyle@coylelawgroup.com)

Date: 5/17/21

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FLORENCE R. PARKER CHAILLA,  
CLAIMANT,  
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Docket No. C-2021-3024417

METROPOLITAN EDISON COMPANY AND CHOICE  
ENERGY, LLC d/b/a 4 CHOICE ENERGY

RESPONDENTS.

**CERTIFICATE OF SERVICE**

I, Brian C. Deeney, hereby certify that on May 17, 2021, have served copies of the Amended Motion for Admission *Pro Hac Vice* via email to:

The Honorable John M. Coogan  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
[jcoogan@pa.gov](mailto:jcoogan@pa.gov)

Florence R. Parker Chaila, JD  
P. O. Box 1111  
Stroudsburg, PA 18360  
[thebusiness2@yahoo.com](mailto:thebusiness2@yahoo.com)

Margaret A. Morris, Esq.  
Reger Rizzo Darnall LLP  
Circa Centre, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

*/s/ Brian C. Deeney*

Brian C. Deeney, Esq.  
Attorney ID: 312184  
One Riverfront Plaza,  
1037 Raymond Blvd, Ste. 800  
Newark, NJ 07102

Date: 5/17/21

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[Brian.Deeney@lewisbrisbois.com](mailto:Brian.Deeney@lewisbrisbois.com)



SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

May 14, 2021

JOHN DAVID COYLE, Esq.  
COYLE LAW GROUP LLP  
55 MADISON AVENUE  
SUITE 400  
MORRISTOWN, NJ 07960

SENT TO JOHN COYLE VIA Email: JCOYLE@COYLELAWGROUP.COM

Dear Attorney COYLE:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as Chaila v. Metropolitan Edison, no. C-2021-3024417, filed in the Supreme Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie S. Libhart".

Stephanie S. Libhart  
Executive Director

cc: BRIAN CHRISTOPHER DEENEY, Esq.  
brian.deeney@lewisbrisbois.com

Pennsylvania Judicial Center  
601 Commonwealth Ave., Ste. 2400  
PO Box 62445, Harrisburg, PA 17106-2445  
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Administering Pennsylvania's Interest On Lawyers Trust Account (IOLTA) Program